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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ROSALINA GUTIERREZ, an individual;

Plaintiff,

v.

OTIS ELEVATOR COMPANY, a foreign
corporation; DOES I through X; ROE
ENTITIES I through X, inclusive, jointly and
severally

Defendants

2:24-cv-01075-JAD-EJY

**STIPULATION AND ORDER
TO EXTEND DISCOVERY
(SECOND REQUEST)**

Plaintiff Rosalina Gutierrez and Defendant Otis Elevator Company by and through their respective counsel of record, hereby stipulate and agree to continue the discovery dates in this matter and request that the court enter a new Discovery Scheduling Order containing said agreed-upon dates.

A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:

The following discovery has been completed by the parties:

1. Plaintiff's initial disclosures





2. Defendant's initial disclosures

3. Defendant's Requests for production of Documents

4. Defendant's Interrogatories

5. Plaintiff's interrogatories to defendant

6. Plaintiff's requests for production of documents to defendant

7. Plaintiff's first set of requests for admission to defendant

**B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS
TO BE COMPLETED:**

1. Deposition of Plaintiff

2. IME of Plaintiff

3. Deposition of Defendant

4. Depositions of treating providers of the plaintiff

5. Site inspection

6. Initial Expert disclosures

7. Rebuttal Expert Disclosures

8. Depositions of Experts

**C. THE REASONS WHY THE DISCOVERY REMAINING WAS NOT
COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY
ORDER:**

The parties have engaged in preliminary discovery but have had difficulties with scheduling as it relates to certain depositions. Moreover, the plaintiff continues to have unexpected difficulty in obtaining a complete copy of her file from

former counsel despite requests for the same. The parties just received records from the employer of the plaintiff and the owner of the site of the incident at question, Treasure Island. The parties are still working on obtaining documents related to the incident. This is despite the best efforts of both counsel, and may lead to additional law and motion work related to the same.

The parties believe an extra sixty days will allow for sufficient time to complete discovery, if not get the parties to a point where pre-trial resolution might occur.

D. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:

<i>Deadline</i>	<i>Old Cut-off</i>	<i>New Cut-off</i>
Amend Pleadings or Add Parties:	April 2, 2025	June 1, 2025
Initial Expert Disclosures:	April 2, 2025	June 1, 2025
Rebuttal Expert Disclosure:	May 3, 2025	July 1, 2025
Close of Discovery:	June 3, 2025	July 31, 2025
Dispositive Motion Deadline:	July 2, 2025	August 30, 2025



1 **F. SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF**
2 **UNDULY DELAYING DISCOVERY OR THE TRIAL OF THIS MATTER.**
3 **SO AGREED.**

4 DATED February 24, 2024

DATED February 24, 2024

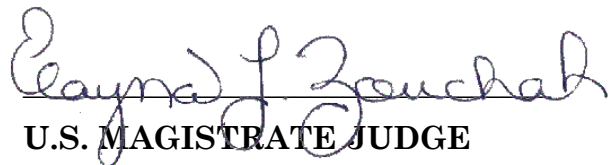
5 **THE BIG GUNS INJURY**
6 **ATTORNEYS**

TUCKER ELLIS LLP

7 /s/Benjamin J. Carman
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/s/Su-Lyn Combs
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Attorneys for Defendant
Otis Elevator Company

10 **IT IS SO ORDERED.**

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12 
13 U.S. MAGISTRATE JUDGE

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15 DATED: February 24, 2025
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